

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

| | | |
|---------------------------------|---|-----------------------|
| IN RE | * | |
| | * | CASE NO. 14-00137/MCF |
| JUAN CARLOS LEON LABOY | * | |
| FRANCES EMIL IRIZARRY RODRIGUEZ | * | CHAPTER 13 |
| | * | |
| <u>DEBTORS</u> | * | |

DEBTORS' MOTION REQUESTING ORDER
RE: AUTHORIZATION TO USE FUNDS FROM 2013 TAX REFUND

TO THE HONORABLE COURT:

NOW COME, JUAN CARLOS LEON LABOY and FRANCES EMIL IRIZARRY RODRIGUEZ, debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. The debtors' confirmed Plan dated February 26, 2014 provides that debtors' tax refunds will be paid into the Plan. See docket no. 27.

2. The debtors have received their 2013 tax refund in the sum of \$769.00. Attached is copy of bank certification of the direct deposit of the 2013 tax refund, dated May 22, 2014, issued by Treasury Department of Puerto Rico.

3. The debtors respectfully submit to the Court that will use these funds to pay for: school's textbooks expenses. Copy of the estimated cost of books is attached.

4. The debtors need to use the funds from the 2013 "tax refund" to pay for this reasonable expense. Furthermore, the debtors are living within a very "tight" budget which barely covers her living expenses and a Plan payment of \$200.00.

5. Based on the abovestated, the debtors respectfully request this Court to Order the authorization of the use of these funds to allow the debtors to pay for this expense with their "tax refund".

Page – 2-
Debtors' Motion Requesting Order
Case no. 14-00137/MCF

WHEREFORE, debtors, through the undersigned attorney respectfully request that this Honorable Court grant the foregoing motion and allow the use of the funds from the 2013 tax refund by the debtors to pay for the above stated expense.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I **CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; I also certify that a copy of this motion was sent via US Mail to Juan Carlos Leon Laboy and Frances Emil Irizarry Rodriguez, Mirador de Bairoa, 2 S 16 Calle 25, Caguas, PR 00727.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 3th day of June, 2014.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR PETITIONERS
PO BOX 0186 CAGUAS PR 00726-0186
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

INSTITUTO LAS AMÉRICAS**Lista de Libros 2014-2015
PRIMER GRADO**

18006

| ESPAÑOL | ISBN | Título | Año | Casa Editora | Precio Regular | Precio Especial |
|--------------------------|---------------|--------------------------------|------|--------------|----------------|-----------------|
| | 9781604846447 | Yabisí -Español 1 | 2009 | ES | \$ 71.95 | \$ 64.75 |
| | 9781604844504 | Yabisí -Español 1 Cuaderno | 2009 | ES | \$ 30.95 | \$ 27.86 |
| | 8488064217 | Leo Cartilla Fonética | | PE | \$ 19.75 | \$ 17.78 |
| INGLÉS | | | | | | |
| | 9781604846508 | Yabisí -English 1 | 2009 | ES | \$ 71.95 | \$ 64.75 |
| | 9781604845341 | Yabisí -English 1 Workbook | 2009 | ES | \$ 30.95 | \$ 27.86 |
| MATEMÁTICAS | | | | | | |
| | 9781604847765 | Yabisí -Matemáticas 1 | 2009 | ES | \$ 71.95 | \$ 64.75 |
| | 9781604844924 | Yabisí -Matemáticas 1 Cuaderno | 2009 | ES | \$ 30.95 | \$ 27.86 |
| CIENCIAS | | | | | | |
| | 9781604847826 | Yabisí -Ciencias 1 | 2009 | ES | \$ 71.95 | \$ 64.75 |
| | 9781604845136 | Yabisí -Ciencias 1 Cuaderno | 2009 | ES | \$ 30.95 | \$ 27.86 |
| ESTUDIOS SOCIALES | | | | | | |
| | 9781604847703 | Yabisí -Sociales 1 | 2009 | ES | \$ 71.95 | \$ 64.75 |
| | 9781604844719 | Yabisí -Sociales 1 Cuaderno | 2009 | ES | \$ 30.95 | \$ 27.86 |

(X) Nueva Adopción

Precios no Incluyen IVU, será añadido al total de su compra según aplique por ley. Puede adquirir los libros en la librería de su preferencia*

Total 480.83

INSTITUTO LAS AMÉRICAS

Carlos E.

Lista de Libros 2014-2015
SEXTO GRADO

18006

| ESPAÑOL | ISBN | Título | Año | Casa Editora | Precio Regular | Precio Especial |
|--------------------------|---------------|--------------------------------|------|--------------|----------------|-----------------|
| | 9781604846492 | Yabisí -Español 6 | 2009 | ES | \$ 71.95 | \$ 64.75 |
| | 9781604844658 | Yabisí -Español 6 Cuaderno | 2009 | ES | \$ 30.95 | \$ 27.86 |
| INGLÉS | | | | | | |
| | 9781604846553 | Yabisí -English 6 | 2009 | ES | \$ 71.95 | \$ 64.75 |
| | 9781604845495 | Yabisí -English 6 Workbook | 2009 | ES | \$ 30.95 | \$ 27.86 |
| MATEMÁTICAS | | | | | | |
| | 9781604847819 | Yabisí -Matemáticas 6 | 2009 | ES | \$ 71.95 | \$ 64.75 |
| | 9781604845075 | Yabisí -Matemáticas 6 Cuaderno | 2009 | ES | \$ 30.95 | \$ 27.86 |
| CIENCIAS | | | | | | |
| | 9781604847871 | Yabisí -Ciencias 6 | 2009 | ES | \$ 71.95 | \$ 64.75 |
| | 9781604845280 | Yabisí -Ciencias 6 Cuaderno | 2009 | ES | \$ 30.95 | \$ 27.86 |
| ESTUDIOS SOCIALES | | | | | | |
| | 9781604847758 | Yabisí -Sociales 6 | 2009 | ES | \$ 71.95 | \$ 64.75 |
| | 9781604844863 | Yabisí -Sociales 6 Cuaderno | 2009 | ES | \$ 30.95 | \$ 27.86 |

(X) Nueva Adopción

Precios no incluyen IVU, será añadido al total de su compra según aplique por ley. Puede adquirir los libros en la librería de su preferencia*

Total \$463.05

